

# Hazardous Waste Compliance Monitoring and Enforcement Log

RECEIVED

FORM  
A

Handler Safety Kleen, Inc.

ID Number **K S D 0 0 7 2 4 6 8 4 6**

LDF ( ) TSF (X) GEN (X) KG ( ) SQ ( ) TRA ( )  
HWM ( ) HWB ( ) UOM ( ) UOB ( ) NOT A GEN ( )

Handler Name: Safety Kleen (Wichita), Inc.

AT  
FT 9/26/02 CL  
RCRIS 9/26/02

Street: 2549 N. New York

City: Wichita, KS 67219

County: Sedgwick

## EVALUATION

New ☒

Followup: Date (on site)

Date (of letter)

Delete ☐

Date       Agency  Type  Reason   Person    District

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other	
GER <input type="text"/>	GPT <input type="text"/>	TGR <input type="text"/>		DCH <input type="text"/>	DGW <input type="text"/>	DMC <input type="text"/>	DPP <input type="text"/>	BRR <input type="text"/>	
GGR <input type="text"/>	GRR <input type="text"/>	TMR <input type="text"/>		DCL <input type="text"/>	DIN <input type="text"/>	DMR <input type="text"/>	DSI <input type="text"/>	CAS <input type="text"/>	
GLB <input type="text"/>	GSC <input type="text"/>	TOR <input type="text"/>		DCP <input type="text"/>	DLB <input type="text"/>	DOR <input type="text"/>	DTR <input type="text"/>	CSS <input type="text"/>	
GMR <input type="text"/>	GSQ <input type="text"/>	TRR <input type="text"/>		DFR <input type="text"/>	DLF <input type="text"/>	DOT <input type="text"/>	DTT <input type="text"/>	FEA <input type="text"/>	
GOR <input type="text"/>		TWD <input type="text"/>		DGS <input type="text"/>	DLT <input type="text"/>	DPB <input type="text"/>	DWP <input type="text"/>	ILD <input type="text"/>	

423589

Used Oil UOM  UOB



RCRA RECORDS

## COMMENTS

VIOLATION # 1 Date Determined

New ☐ Change ☒ Delete ☐ Comments

Agency  Number  Area  Priority  Type

Regulation Citation: K.A.R. 28-31-4(j)(1)(A) *OK*

Description: Two open satellite drums Returned to Compliance

in the lab and the processing area.

Sch'd

Actual

VIOLATION # 2 Date Determined

New ☐ Change ☒ Delete ☐ Comments

Agency  Number  Area  Class  Priority  Type

Regulation Citation: K.A.R. 28-31-4(j)(1)(B) *OK*

Description: One 40-gallon satellite Returned to Compliance

drum not marked with the words hazardous waste in

building B.

Sch'd

Actual

VIOLATION # 3 Date Determined

New ☐ Change ☒ Delete ☐ Comments

Agency  Number  Area  Class  Priority  Type

Regulation Citation: KAR 28-31-8 / 40CFR264.171 / Permit Cond. III. C. *OK*

Description: One 55-gallon storage Returned to Compliance

drum is not in good condition in building C.

Sch'd

Actual

VIOLATION # 4 Date Determined

New ☐ Change ☒ Delete ☐ Comments

Agency  Number  Area  Class  Priority  Type

Regulation Citation: KAR 28-31-14 / 40CFR268.50(a)(2)(i) /

Description: Permit Cond. III.B.1. *OK* Returned to Compliance

No start accumulation date on 2 lab pak storage

containers in building J.

Sch'd

Actual

Hazardous Waste Compliance

# Monitoring and Enforcement

RECEIVED

FORM  
B

ID Number **K S D 0 0 7 2 4 6 8 4 6**

Handler Name: Safety Kleen (Wichita), Inc.

**VIOLATION # 5** Date Determined **0 6 1 2 0 2**

New ☐ Change ☒ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **G P T** Class **1** Priority **1** Type **S R**

Regulation Citation: **K.A.R. 28-31-4(j)(2)**

Description: **Improper start accumulation date on 2 55-gallon satellite drums in the processing area.**

Sch'd **0 7 1 5 0 2** Actual **0 6 1 2 0 2**

**VIOLATION # 6** Date Determined **0 6 1 2 0 2**

New ☐ Change ☒ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **D G S** Class **1** Priority **1** Type **S R**

Regulation Citation: **Permit Condition II. A.**

Description: **Failure to maintain the roofs in buildings B, J, I, & D.**

Sch'd **0 7 1 5 0 2** Actual **0 7 1 5 0 2**

**VIOLATION # 7** Date Determined **0 6 1 3 0 2**

New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **D G S** Class **2** Priority **1** Type **S R**

Regulation Citation: **K.A.R. 28-31-4(k)/Permit Cond. III.6.**

Description: **138 violations on the daily & weekly inspection logs.**

Sch'd **0 7 1 5 0 2** Actual **0 7 1 5 0 2**

**VIOLATION # 8** Date Determined **0 6 1 3 0 3**

New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **D G S** Class **2** Priority **1** Type **S R**

Regulation Citation: **K.A.R. 28-31-4(k)/Permit Condition I.I.2.e.**

Description: **Failure to provide 61 daily inspection logs for May and June 2001.**

Sch'd **0 7 1 5 0 2** Actual **0 7 1 5 0 2**

**VIOLATION # 9** Date Determined **0 6 1 3 0 2**

New ☒ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **G S C** Class **2** Priority **1** Type **S R**

Regulation Citation: **KAR28-31-4(q)/40CFR262.16**

Description: **Failure to file a notice with the Secretary of KDHE for exporting hazardous waste to a foreign source 5 times.**

Sch'd **0 7 1 5 0 2** Actual **0 7 1 5 0 2**

**VIOLATION #** Date Determined **0 6 1 3 0 2**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency **S** Number **0 0 0 0** Area **0 0 0 0** Class **0 0** Priority **0 0** Type **0 0**

Regulation Citation:

Description:

Sch'd **0 0 0 0 0 0** Actual **0 0 0 0 0 0**

## ENFORCEMENT

New ☒ Change ☐ Delete ☐

Date **0 2 0 6 1 3** Number **0 0 0 0** Agency **S** Type **C E I** District **S C** Person **D L T**

## COVERED

Agency	Violation Number	Area	Agency	Violation Number	Area	Agency	Violation Number	Area
S	0 6	D G S	S			S		
S	0 7	D G S	S			S		
S	0 8	D G S	S			S		
S	0 9	G S C	S			S		

Comments:

Rev. 4-94

# Hazardous Waste Compliance Monitoring and Enforcement Log

FORM

## NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
Division of Environment  
Waste Management ProgramHazardous Waste: Complaint( ) LDF( ) TSF( ) GEN( ) KG( ) SQ( ) TRA( ) UOM( ) UOB( ) NOT A GEN( )  
Solid Waste: Complaint( ) SLF( ) TRF( ) ILF( ) CDL( ) HHW( ) OBS( ) UOS( ) WTT( ) WTP( ) WTM( ) YWC( ) MED( )TO: Safety Kleen (Wichita) Inc. 6/12/02  
Facility Name Date2549 N. New York Wichita KS 67219  
Address City State Zip Code

K S D 0 0 7 2 4 6 8 4 6

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☒ Violations As Follows☐ No Violations Identified

## Citation

## Description of Violation

- \* ① KAR 28-31-4(j)(1)(A) 2- Open Satellite Drums in the Lab + the Processing Area
- \* ② KAR 28-31-4(j)(1)(B) 40-gallon Satellite Drum not marked with the words "Hazardous Waste, Building B"
- \* ③ KAR 28-31-8(g)(A) 55-gallon Storage drum is not in good condition in building C
- \* ④ KAR 28-31-4(j)(2) No start accumulation date on 2 lab pak storage containers in building J
- \* ⑤ KAR 28-31-4(j)(2) Improper start accumulation date on 2 55-gallon satellite drums in the processing area.

☒ Other Comments/Concerns:\* Corrected during the inspection\* The leaking roofs in buildings D, E + F are a concern. dk

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:

Debbie Travis  
Kansas Department of Health and Environment  
Bureau of District Operation  
Waste Management Programs  
130 S Market Suite 6050  
Wichita, Kansas 67202-3802

RECEIVED

SEP 23 2002

BUREAU OF WASTE MANAGEMENT

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 337-6020 or Bureau of Waste Management in the Topeka Office at (913) 296-1604.

This Notice was prepared by

Debbie TravisDate 6/13/02

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed

Name: Russell DunnSignature: Russell DunnTitle: Facility MgrDate: 6/13/02

# NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
Division of Environment  
Waste Management Program

Hazardous Waste: Complaint( ) LDF( ) TSF( ) GEN( ) KG( ) SQ( ) TRA( ) UOM( ) UOB( ) NOT A GEN( )  
Solid Waste: Complaint( ) SLF( ) TRF( ) ILF( ) CDL( ) HHW( ) OBS( ) UOS( ) WTT( ) WTP( ) WTM( ) YWC( ) MED( )

TO: Safety-Kleen (Wichita), Inc. 6/12+13/02  
Facility Name Date

2549 N. New York Wichita KS 67219  
Address City State Zip Code

K S D 0 0 7 2 4 6 8 4 6

EPA Identification No.

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☒ Violations As Follows

☐ No Violations Identified

- ⑥ Permit Condition II. A.  
⑦ KAR 28-31-4(k) /  
Permit Condition III. G.

Description of Violation  
Failure to maintain the roofs in buildings  
B, J, I & D  
138 ft  
145 violations on the daily + weekly inspection  
logs. (45 PM missing work orders, 75 400  
corrective action noted, 35 with no time,  
#56 didn't use full name) 22 ft

☒ Other Comments/Concerns:

- ⑧ Employee training needs to be reviewed concerning inspections  
logs, work orders procedures, satellite containers, and storage drum  
labeling.

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Debbie Travis

Date 6/13/02

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed

Name: Russell Dunn

Signature: Russell Dunn

Title: Facility Mgr

Date: 6/13/02

## NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
Division of Environment  
Waste Management ProgramHazardous Waste: Complaint( ) LDF( ) TSF(☒) GEN(☒) KG( ) SQ( ) TRA( ) UOM( ) UOB( ) NOT A GEN( )  
Solid Waste: Complaint( ) SLF( ) TRF( ) ILF( ) CDL( ) HHW( ) OBS( ) UOS( ) WTT( ) WTP( ) WTM( ) YWC( ) MED( )TO: Safety-Kleen (Wichita) Inc 6/12/02  
Facility Name Date2549 N. New York Wichita KS 67219  
Address City State Zip CodeKS0007246846  
EPA Identification No.                      
Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and hazardous waste statutes and regulations.

☒ Violations As Follows☐ No Violations Identified

Citation	Description of Violation
⑧ <u>KAR 28-31-4(k) /</u> <u>Permit Condition # 6</u> <u>1-1.2.e</u>	<u>Failure to provide 61 daily inspection</u> <u>logs for May + June 2001.</u>
⑨ <u>KAR 28-31-4(g) / 40 CFR 262,</u> <u>Subpart E / Permit</u> <u>Condition, I. G.</u>	<u>Failure to file a notice with the Secretary</u> <u>of KDHE for exporting hazardous waste</u> <u>to a foreign source 5 different times</u> <u>3/14/01, 8/2/01, 11/8/01, 1/19/02, + 2/12/02</u>

☐ Other Comments/Concerns:

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions to be taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

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This Notice was prepared by

Debbie TravisDate 6/20/02

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE GENERATOR/TRANSPORTER  
COMPLIANCE INSPECTION CHECKLIST

GENERAL

☒ ROUTINE ☐ COMPLAINT

EPA ID KSD 007 246 846 Time 9:10 a.m. Date June 12 & 13, 02

Facility Name Safety Kleen (Wichita), Inc District SCDO

Street 2549 N. New York City Wichita, Kansas ZIP 67219

Mailing Address (if different than above) \_\_\_\_\_

County Sedgwick Phone 316 269-7400

Contact(s) Russell J. Dunn, Facility Manager

Inspector(s) Debbie Travis, Steff Fackrell, SCDO, & Akhter Hossain, Topeka SIC: \_\_\_\_\_

Type of Business H. W. vendor / broker Number of Employees 29

Facility size classification: ☐ Closed ☐ Small Qty. Generator ☒ EPA Generator  
☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: ☒ T/S/D Facility ☐ Used Oil Activities  
(complete applicable checklist) ☐ HW Burner/Marketer ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets (KSA 65-3447)? NO  
If yes, explain: \_\_\_\_\_

Industrial Wastes Generated

(List hazardous wastes first)

Waste:	Contaminated floor debris, PPE, lab samples, damaged containers, and spill clean-up.	
If waste is hazardous give HW ID Number:	N/A	
Amount generated per month:	1 to 2 Tons / month	
Amount presently in storage:	Varies	
Accumulation time:	Varies	
Present disposal methods:	Deer Park, TX or Aragonite, UT	

Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal methods:		

Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
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Waste:		
If waste is hazardous give HW ID Number:		
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal methods:		

**General Requirements (GGR)**

- |                                                                                                                                       | YES   | NO    | NA |
|---------------------------------------------------------------------------------------------------------------------------------------|-------|-------|----|
| 1. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? [KAR 28-31-4(b)/40 CFR 261.2]       | [ X ] | [ ]   |    |
| a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? [KAR 28-31-4(b)(3)(A)]                       | [ X ] | [ ]   |    |
| b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? [KAR 28-31-4(f)(1)(C)] | [ X ] | [ ]   |    |
| 2. Is hazardous waste(s) disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW)? [KAR 28-31-3/40 CFR 261.4]    | [ ]   | [ X ] |    |
| a. If yes, does the facility discharge greater than 25 kilograms per month?                                                           | [ ]   | [ ]   |    |
| b. If yes, has facility submitted the RCRA (Wastewater) Notification Form [40 CFR, Part 403.12(p)] to the following agencies:         |       |       |    |
| City - POTW?                                                                                                                          | [ ]   | [ ]   |    |
| US EPA Region VII - Director of Waste Management?                                                                                     | [ ]   | [ ]   |    |
| KDHE - Bureau of Waste Management?                                                                                                    | [ ]   | [ ]   |    |
| NOTE: RCRA (Wastewater) Notification forms are obtained from: Bureau of Water (785) 296-5551.                                         |       |       |    |
| 3. Does facility dispose of industrial waste that requires a Special Waste Disposal Authorization at a permitted sanitary landfill?   | [ ]   | [ X ] |    |
| a. If yes, list the authorization number(s):                                                                                          |       |       |    |

<b>General Requirements:</b>	<input checked="" type="checkbox"/> <b>Compliance</b>	<input type="checkbox"/> <b>Non-Compliance</b>	<input type="checkbox"/> <b>N/A</b>
------------------------------	-------------------------------------------------------	------------------------------------------------	-------------------------------------

**Notification of Requirements (GGR)**

- |                                                                                           |       |     |     |
|-------------------------------------------------------------------------------------------|-------|-----|-----|
| 4. Has facility notified KDHE and obtained an EPA Identification Number? [KAR 28-31-4(c)] | [ X ] | [ ] |     |
| 5. Is current notification accurate? [KAR 28-31-4(c)(1)]                                  | [ X ] | [ ] | [ ] |

<b>Notification Requirements:</b>	<input checked="" type="checkbox"/> <b>Compliance</b>	<input type="checkbox"/> <b>Non-Compliance</b>	<input type="checkbox"/> <b>N/A</b>
(small quantity generator not accumulating, stop here)			



**Pre-Transport Requirements (GPT)**

	YES	NO	NA
6. Does generator package waste in accordance with 49 CFR 173, 178, and 179 requirements? [KAR 28-31-4(e)(1)]	[ X ]	[ ]	
7. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of Subpart E of 49 CFR 172? [KAR 28-31-4(e)(2)]	[ X ]	[ ]	
8. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 49 CFR 172 Subpart D? [KAR 28-31-4(e)(3)]	[ X ]	[ ]	
a. Does generator mark each container of 110 gallons or less as below? [KAR 28-31-4(e)(3)]	[ X ]	[ ]	

*Hazardous Waste-Federal Law Prohibits Improper Disposal.*

*If found, contact the nearest police or public safety authority or the US EPA.*

*Generator's Name and Address  
Manifest Document Number*

9. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? [KAR 28-31-4(e)(4)]	[ X ]	[ ]	
10. Does generator only use a transporter who has notified the department and obtained an EPA Identification Number? [KAR 28-31-4(c)(2)]	[ X ]	[ ]	

**Pre-Transport Requirements:** [X] Compliance [ ] Non-Compliance [ ] N/A

**Storage Requirements (GPT)**

11. Does generator temporarily store waste in containers before transport?	[ X ]	[ ]	
If yes,			
a. Are containers marked with the words "Hazardous Waste"? [KAR 28-31-4(g)(3) or (h)(1)(D)]	[ X ]	[ ]	
b. Is the accumulation start date marked on each container? [KAR 28-31-4(g)(2) or (h)(1)(C)]	[ X ]	[ ]	
c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? [KAR 28-31-4(g)(1) or (h)(1)(B)]	[ X ]	[ ]	
d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? [KAR 28-31-4(g)(1) or (h)(1)(B)]	[ ]	[ ]	
A. If yes, are these inspections documented in a log that includes complete date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? [KAR 28-31-4(k)/40 CFR 265.15(d)]	[ ]	[ X ]	Viol. 7

**Storage Requirements:** [ ] Compliance [X] Non-Compliance [ ] N/A  
(Small quantity generator accumulating <1,000 Kilograms stop here)

## Storage Requirements for Kansas and EPA Generators (GPT)

		YES	NO	NA
e.	Is hazardous waste stored for 90 days or less?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f.	Is > 1,000 kilograms of hazardous waste stored for more than 90 days?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g.	Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) [KAR 28-31-4(g)(1)/40 CFR 265.176]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? [KAR 28-31-4(g)(1) or (h)(1)(B)/40 CFR 265.177]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i.	Does generator have any satellite storage areas? [KAR 28-31-4(j)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	A. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	B. Is the container in good condition and closed except to add or remove waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Viol. 1
	C. Is the container marked with the words "Hazardous Waste"?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Viol. 2
	D. Is the container marked with the accumulation start date at the time it becomes full? <b>Improper start date.</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Viol. 5
	E. Is the full container moved to the storage area within three days after it becomes full?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

<b>Storage Requirements:</b>	<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
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## Manifests (GMR)

12.	Is a contractual agreement used in place of manifesting? [KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	If yes,			
a.	Does the contractual agreement include the type of waste and frequency of shipments?	<input type="checkbox"/>	<input type="checkbox"/>	
b.	Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	<input type="checkbox"/>	<input type="checkbox"/>	
c.	Is a copy of the agreement kept for a period of three years after termination of agreement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.	Is a current manifest showing revision date and burden disclosure statement used? [KAR 28-31-4(d)/40 CFR 262.20]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a.	If yes, does manifest(s) include:			
	A. Generator EPA Identification Number (12 digit) and unique manifest document number (five digit)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	B. Number of pages?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	C. Generator's name and mailing address?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	D. Generator's phone number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	E. Transporter 1 Name?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	F. Transporter 1 EPA Identification Number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	G. Transporter 2 Name?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	H. Transporter 2 EPA Identification Number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	I. Name and site address of designated facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	J. Designated facility's EPA Identification Number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	YES	NO	NA
K. Waste Description (DOT shipping name, hazard class, and Identification Number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
i. If applicable, are the requirements of 49 CFR 172.203(k) met?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
L. Number and type of containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
M. Total quantity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
N. Unit (weight or volume)?	<input type="checkbox"/>	<input type="checkbox"/>	
O. Special handling instructions?	<input type="checkbox"/>	<input type="checkbox"/>	
P. Generator's certification including waste minimization statement, generator's signature and date?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Q. Name, signature, and date of transporter 1?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
R. Name, signature, and date of transporter 2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does generator retain a copy of manifest(s) signed by both generator and transporter? [KAR 28-31-4(d)(4)(A-C)/40 CFR 262.23]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Does generator retain copy of manifest(s) signed and dated by T/S/D facility owner/operator for three years? [KAR 28-31-4(f)(1)(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
A. If yes, was exception report(s) filed? [KAR 28-31-4(f)(4)(B)]	<input type="checkbox"/>	<input type="checkbox"/>	
i. If yes, was copy retained for three years? [KAR 28-31-4(f)(1)(A)]	<input type="checkbox"/>	<input type="checkbox"/>	

<b>Manifesting Requirements:</b>	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
----------------------------------	------------------------------------------------	-----------------------------------------	------------------------------

#### Land Disposal Restriction Requirements (GLB)

14.	Does facility generate waste(s) subject to the Land Disposal Restrictions? [KAR 28-31-14/40 CFR 268]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
15.	Does the generator dispose of his waste under a contractual or tolling agreement? [40 CFR 268.7(a)(10)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a.	If yes, is a Land Disposal Restriction Notice available for the initial shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b.	If yes, is a copy of this notice kept for three years after termination of the agreement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.	Is the waste(s) covered by a National Variance(s), Extension, or Petition? [40 CFR 268.5 & 6]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a.	If yes, describe the variance, extension, or petition which applies:			
17.	Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal? [40 CFR 268.7(a)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes,				
a.	Does the generator provide a notice with each shipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b.	Does the notice include: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or nonwastewater classification, and subcategory, if applicable?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
18.	Has the generator determined that his waste meets applicable treatment standards or does not exceed prohibition levels and requires no further treatment? [40 CFR 268.7(a)(2)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a.	If yes, does the generator provide a notice and certification statement			

- with each shipment ensuring the waste meets applicable treatment standards or prohibition levels? ☐ ☐
19. Is the waste covered by an exemption? [40 CFR 268.7(a)(3)] ☐ ☒
- a. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? ☐ ☐
20. Does the generator accumulate and treat waste in tanks, containers, or containment buildings to meet applicable treatment standards? [40 CFR 268.7(a)(4)] ☐ ☒
- If yes,
- a. Does the generator have verification that a notice was submitted to KDHE at least 30 days prior to treatment activity? ☐ ☐ N/A
- b. Does the generator have, on-site, a written waste analysis plan describing procedures used to comply with the treatment standards? ☐ ☐ N/A
- c. Does the generator ship waste off-site? ☒ ☐
- A. If yes, does the generator provide a notice and certification statement with each shipment? ☒ ☐
21. Has the generator determined his waste to be restricted based solely on his knowledge of the waste?[40 CFR 268.7(a)(5)] ☐ ☒
- a. If yes, does the generator maintain all supporting data in his on-site files? ☐ ☐
22. Has the generator determined his waste to be restricted based on testing [40 CFR 268.7(a)(5)] ☐ ☒
- a. If yes, does the generator maintain a copy of these waste analysis in his on-site files? ☐ ☐
23. Is the waste excluded from the definition of hazardous or solid waste, or is exempt from Subtitle C regulations? (40 CFR 268.7(a)(6)) ☐ ☒
- a. If yes, does the generator retain, in their file, a one-time notice of the generation and subsequent exclusion from the definition of hazardous or solid waste, and information regarding the disposition of the waste? ☐ ☐
24. Does the generator retain copies of all notices, certifications, demonstrations waste analysis data, and other documents for at least 3 years? [40 CFR 268.7(a)(7)] ☒ ☐ ☐
25. Does the generator claim that the hazardous debris is excluded from the definition of hazardous waste under 40 CFR 261.3(f)(1) or (2)? [40 CFR 268.7(d)] ☐ ☒
- a. If yes, does the generator provide a one-time notice and certification to the State of Kansas and retain a copy in his files? ☐ ☐
26. Is the generator managing a lab pack waste(s)? [40 CFR 268.7(a)(8)] ☒ ☐
- If yes,
- a. Does the generator wish to use an alternative treatment standard? ☐ ☒
- b. Does the generator provide a notice and certification with each shipment? ☒ ☐
27. Does generator claim that their characteristic waste is no longer hazardous? [40 CFR 268.9(d)] ☐ ☒
- If yes,

- |    |                                                                                                                             | YES                      | NO                       | NA |
|----|-----------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|----|
| a. | Has the generator submitted a one-time notice and certification to the State of Kansas and retained a copy for their files? | <input type="checkbox"/> | <input type="checkbox"/> |    |
| b. | Does the information on the notice and certification need to be updated?                                                    | <input type="checkbox"/> | <input type="checkbox"/> |    |

**LDR Requirements:** ☒ Compliance ☐ Non-Compliance ☐ N/A

### Special Conditions (GSC)

28. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F) ☒ ☐
- If yes,
- a. Has generator filed a notice with the Secretary of the KDHE? ☐ ☒ VIOL. 9
- b. Is waste manifested and signed by a foreign consignee? ☒ ☐ ☐
- c. If generator transports waste out of the country, has confirmation of delivered shipment been received? ☒ ☐

**Special Conditions Requirements:** ☐ Compliance ☒ Non-Compliance ☐ N/A

### Kansas Generator's Emergency Preparedness (GPT)

29. Has facility named one employee as emergency coordinator? ☐ ☐  
[KAR 28-31-4(h)(1)(E)]
- a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? ☐ ☐
- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? ☐ ☐
- c. Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)? ☐ ☐
30. Is the following information posted next to at least one telephone which is immediately accessible in an emergency? [KAR 28-31-4(h)(1)(F)]
- a. Name and telephone number of the emergency coordinator(s)? ☐ ☐
- b. Location of fire extinguishers, fire alarms, or spill control material, if available? ☐ ☐
- c. Telephone number of fire department unless facility has a direct alarm? ☐ ☐
31. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? [KAR 28-31-4(h)(1)(G)] ☐ ☐
- a. Is this training documented in any way? ☐ ☐

**KS Gen.'s Emergency Preparedness Requirements:** ☐ Compliance ☐ Non-Compliance ☒ N/A

(If Kansas generator, stop here)

**Biennial Reports (GRR)**

	YES	NO	NA
32. Has EPA generator submitted a biennial report(s) to KDHE? [KAR 28-31-4(f)(2)]	[ X ]	[ ]	
a. If yes, does the biennial report include a written description of the generator's waste minimization program? [KAR 28-31-4(f)/40 CFR 262.41(a)]	[ X ]	[ ]	[ ]
A. If yes, does the description include:			
i. Efforts undertaken during the year to reduce the volume and toxicity of waste generated? [KAR 28-31-4(f)/40 CFR 262.41(a)(6)]	[ X ]	[ ]	
ii. Changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [KAR 28-31-4(f)/40 CFR 262.41(a)(7)]	[ X ]	[ ]	
iii. Certification by the generator or authorized representative? [KAR 28-31-4(f)/40 CFR 262.41(a)(8)]	[ X ]	[ ]	
b. If no, can the facility personnel provide a verbal description of the waste minimization program?	[ ]	[ ]	[ X ]
Description of Program:			
<hr/>			
c. Is there any visual evidence of the facility's waste minimization efforts? If yes, describe the activities/program observed.	[ ]	[ ]	N/A
<hr/>			
d. Does generator retain a copy of the report for three years? [KAR 28-31-4(f)(1)(B)]	[ ]	[ ]	N/A

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:	[ X ] Compliance	[ ] Non-Compliance	[ ] N/A
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**Preparedness and Prevention (GPT)**

33. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:			
a. Internal communication or alarm system easily accessible in case of emergency? [KAR 28-31-4(g)(4)/40 CFR 265.32(a)]	[ X ]	[ ]	
b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? [KAR 28-31-4(g)(4)/40 CFR 265.32(b)]	[ X ]	[ ]	[ ]
c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? [KAR 28-31-4(g)(4)/40 CFR 265.32(c)]	[ X ]	[ ]	
d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? [KAR 28-31-4(g)(4)/40 CFR 265.32(d)]	[ X ]	[ ]	
e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? [KAR 28-31-4(g)(4)/40 CFR 265.33]	[ X ]	[ ]	
34. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [KAR 28-31-4(g)(4)/40 CFR 265.35]	[ X ]	[ ]	
35. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:			

YES	NO	NA
-----	----	----

- |    |                                                                                                                                                                                                                      |       |     |     |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----|-----|
| a. | Familiarized the local emergency authorities with the facility, waste handled, entrances and exits? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)]                                                                          | [ X ] | [ ] |     |
| b. | Designated one authority where one or more police or fire departments might respond to an emergency? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)]                                                                         | [ X ] | [ ] | [ ] |
| c. | Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)]                                                                | [ X ] | [ ] | [ ] |
| d. | Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. [KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)] | [ X ] | [ ] |     |
36. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [KAR 28-31-4(g)(4)/40 CFR 265.37(b)]
- |     |     |     |
|-----|-----|-----|
| [ ] | [ ] | N/A |
|-----|-----|-----|

#### Preparedness and Prevention

Requirements: [ X ] Compliance [ ] Non-Compliance [ ] N/A

#### Personnel Training (GPT)

37. Has the owner/operator established a hazardous waste management training program? [KAR 28-31-4(g)(4)/40 CFR 265.16]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- a. Is the program directed by a person trained in hazardous waste management? [40 CFR 265.16(a)(2)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- b. Are new personnel trained within six months after their employment? [40 CFR 265.16(b)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- c. Are new employees supervised until training is completed? [40 CFR 265.16(b)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- d. After initial training, are employees trained on an annual basis? [40 CFR 265.16(c)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- e. Does the facility maintain the following documents and records:
- A. Job title for each position related to hazardous waste management and the name of the employee filling each job? [40 CFR 265.16(d)(1)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- B. Written job description for each position? [40 CFR 265.16(d)(2)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- C. Description of type and amount of training to be given each person? [40 CFR 265.16(d)(3)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- D. Records of training given to facility personnel? [40 CFR 265.16(d)(4)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|

Personnel Training Requirements: [ X ] Compliance [ ] Non-Compliance [ ] N/A

#### Contingency Plan (GPT)

38. Does the facility have a contingency plan? [KAR 28-31-4(g)(4)/40 CFR 265 Subpart D]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- If yes,
- a. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? [40 CFR 265.52(d)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- b. Is an emergency coordinator available at all times? [40 CFR 265.55]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [40 CFR 265.52(a)]
- |       |     |
|-------|-----|
| [ X ] | [ ] |
|-------|-----|
- |     |    |    |
|-----|----|----|
| YES | NO | NA |
|-----|----|----|

- d. Does the plan describe arrangements made with emergency response agencies? [40 CFR 265.52(c)] [ X ] [ ]
- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? [40 CFR 265.52(e)] [ X ] [ ]
- f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? [40 CFR 265.52(f)] [ X ] [ ]
- g. Have copies of the plan been provided to outside emergency response agencies and hospitals? [40 CFR 265.53] [ X ] [ ]
- h. Has implementation of the plan been required at the facility? [ X ] [ ]
  - A. If yes, was the facility required to submit a written report on the incident to the KDHE? [ ] [ X ]
  - i. If yes, was the written report submitted? [40 CFR 265.56(j)] [ ] [ ] [ ]

<b>Contingency Plan Requirements:</b> <span style="margin-left: 100px;">[ X ] Compliance</span> <span style="margin-left: 100px;">[ ] Non-Compliance</span> <span style="margin-left: 100px;">[ ] N/A</span>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

(if EPA generator, stop here.)



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE T/S/D FACILITY  
COMPLIANCE INSPECTION CHECKLIST

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

**General**

EPA ID KSD 007 246 846 Time 09:10 AM Date June 12 & 13, 02  
Facility Name Safety Kleen (Wichita), Inc District SCDO  
Street 2549 N. New York City Wichita Kansas Zip 67219  
Mailing Address (if different than above) \_\_\_\_\_  
County Sedgwick Phone 316 269-7400  
Contact(s) Russell J. Dunn, Facility Manager  
Inspector(s) Debbie Travis, Steff Fackrell, SCDO & Akhter Hossain, Topeka SIC: \_\_\_\_\_  
Type of Business H.W. vendor & broker Number of Employees 29  
Has the company declared any information/process as trade secrets (KSA 65-3447)? NO  
If yes, explain: \_\_\_\_\_

**Activity at Site**

**Treatment**

<input type="checkbox"/> Chem/Phys/Bio Treatment	<input type="checkbox"/> Incineration	<input type="checkbox"/> Thermal Treatment
<input type="checkbox"/> Containment Building	<input type="checkbox"/> Recycling/Recovery	<input type="checkbox"/> Volume Reduction
<input type="checkbox"/> Filtration	<input type="checkbox"/> Reprocessing	<input type="checkbox"/> Other _____

**Storage**

<input type="checkbox"/> Containment Building	<input type="checkbox"/> Surface Impoundment	<input checked="" type="checkbox"/> Other <u>BULK</u>
<input checked="" type="checkbox"/> Drums	<input checked="" type="checkbox"/> Tank(s) (complete applicable checklist)	
<input type="checkbox"/> Pile		

**Disposal**

<input type="checkbox"/> Deep Well Injection	<input type="checkbox"/> Landfill	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Incineration	<input type="checkbox"/> Land Treatment	<input type="checkbox"/> Other _____

**Comments:**

Currently the site is a storage facility.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Waste Analysis Plan (DGS)**

	YES	NO	NA
1 Does facility maintain a copy of its waste analysis plan at the facility? [264.13(b)/265.13(b)]	[ X ]	[ ]	[ ]
a. If yes, does the plan include:			
A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)(1))]	[ X ]	[ ]	
B. Test methods which are used to test for these parameters? [264.13(b)(2)/265.13(b)(2)]	[ X ]	[ ]	
C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)]	[ X ]	[ ]	
D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)]	[ X ]	[ ]	
E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)]	[ X ]	[ ]	[ ]
F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest? [264.13(c)/265.13(c)]	[ X ]	[ ]	[ ]

**Waste Analysis Plan Requirements:** [ X ] Compliance [ ] Non-Compliance [ ] N/A

**Security (DGS)**

2 Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)?	[ ]	[ X ]	
If no,			
a. Does the facility provide either of the following:			
A. A 24-hour surveillance system (TV monitoring or guards)? [264.14(b)(1)/265.14(b)(1)]; OR	[ X ]	[ ]	[ ]
B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)]	[ X ]	[ ]	[ ]
b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)]	[ X ]	[ ]	

**Security Requirements:** [ X ] Compliance [ ] Non-Compliance [ ] N/A

**General Inspection Requirements (DGS)**

3 Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)]	[ X ]	[ ]	
4 Does the owner/operator keep the written inspection schedule at the facility? [264.15(b)(2)/265.15(b)(2)]	[ ]	[ X ]	Viol. 8
5 Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)]	[ X ]	[ ]	
6 Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)]	[ ]	[ X ]	Viol. 7

YES NO NA

- 7 Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)] ☐ ☒ Viol. 7

Inspection Requirements: ☐ Compliance ☒ Non-Compliance ☐ N/A

### Personnel Training (DGS)

- 8 Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]

- |    |                                                                                                                                              |                                     |                          |
|----|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|
| a. | Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. | Written job description for each position? [264.16(d)(2)/265.16(d)(2)]                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. | Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)]                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. | Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)]                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Personnel Training Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

### Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

- 9 Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)] ☒ ☐

If yes,

- |    |                                                                                                                                                                |                                     |                                     |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|
| a. | Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)]                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b. | Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)]                                                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c. | Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)]                                                                                           | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d. | Does a check of the areas used to handle ignitable or reactive wastes show:                                                                                    |                                     |                                     |
| A. | Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)]                                                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| B. | Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)] | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| C. | Evidence of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)]                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| D. | Evidence of any leakage from or corrosion of containers? [264.17(b)(4)/265.17(b)(4)]                                                                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

- 10 For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)] ☐ ☐ ☒

### Ignitable, Reactive, or Incompatible Waste

Contingency Plan Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

### Preparedness and Prevention (DPP)

- 11 Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31] ☒ ☐

YES NO NA

- 12 If applicable to the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)] ☒ [ X ] ☐ [ ] ☐ [ ]
- 13 Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33] ☒ [ X ] ☐ [ ] ☐ [ ]
- 14 Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:
- a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)] ☒ [ X ] ☐ [ ] ☐ [ ]
- 15 Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35] ☒ [ X ] ☐ [ ] ☐ [ ]
- 16 As appropriate for the type(s) of waste handled, has the owner/operator:
- a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)] ☒ [ X ] ☐ [ ] ☐ [ ]
  - d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)] ☒ [ X ] ☐ [ ] ☐ [ ]
- 17 In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)] ☐ [ ] ☐ [ ] ☒ [ X ]

#### Preparedness and Prevention

Requirements: ☒ [ X ] Compliance ☐ [ ] Non-Compliance ☐ [ ] N/A

#### Contingency Plan and Emergency Procedures (DCP)

- 18 Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)] ☒ [ X ] ☐ [ ]
- a. If yes, does the plan:
- A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)] ☒ [ X ] ☐ [ ]

- B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)] [ X ] [ ]
- C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)] [ X ] [ ]
- D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)] [ X ] [ ]
- E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)] [ X ] [ ]
- 19 Is an emergency coordinator available at all times? [264.55/265.55] [ X ] [ ]
- 20 Has implementation of the plan been required at the facility? [ ] [ X ]
- a. If yes, was the facility required to submit a written report on the incident to the KDHE? [ ] [ ]
- A. If yes, was the written report submitted? [264.56(j)/265.56(j)] [ ] [ ]

**Contingency Plan and Emergency Procedures Requirements:**

[X] Compliance [ ] Non-Compliance [ ] N/A

**Manifest System, Recordkeeping, and Reporting (DMR)**

- 21 Does the facility receive waste from off-site? [264.71/265.71] [ X ] [ ]
- a. If yes, does the owner/operator:
- A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)] [ X ] [ ]
- B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)] [ X ] [ ]
- C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)] [ X ] [ ]
- D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)] [ X ] [ ]
- E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)] [ X ] [ ]
- 22 Does the facility receive any waste from a rail or water (bulk shipment transporter)? [ ] [ X ]
- a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)] [ ] [ ]
- If yes, does the owner/operator:
- A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)] [ ] [ ]
- B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)] [ ] [ ]
- C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)] [ ] [ ]
- D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)] [ ] [ ]
- C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)] [ ] [ ]
- 23 Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72] [ X ] [ ]
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)] [ X ] [ ]

	YES	NO	NA
A. If the discrepancy was not reconciled within 15 days, did the owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)]	[ X ]	[ ]	
24 Does the owner/operator keep a written operating record at the facility? [264.73(a)/265.73(a)]	[ X ]	[ ]	
a. If yes, does the operating record include:			
A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)]	[ X ]	[ ]	
B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)]	[ X ]	[ ]	
C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)]	[ X ]	[ ]	
D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)]	[ X ]	[ ]	
E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)]	[ X ]	[ ]	
F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)]	[ X ]	[ ]	
G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)]	[ X ]	[ ]	
H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)]	[ X ]	[ ]	
I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)]	[ X ]	[ ]	
J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)]	[ X ]	[ ]	[ ]
25 Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75]	[ X ]	[ ]	
a. If yes, does the report include:			
A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)]	[ X ]	[ ]	
B. The calendar year covered by the report? [264.75(b)/265.75(b)]	[ X ]	[ ]	
C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[ X ]	[ ]	
D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)]	[ X ]	[ ]	
E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)]	[ X ]	[ ]	
b. If yes and the facility receives waste from off-site facilities, does the report include:			
A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)]	[ X ]	[ ]	[ ]
B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[ X ]	[ ]	[ ]
c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators?	[ X ]	[ ]	[ ]
d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:			
A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)]	[ X ]	[ ]	[ ]
B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)]	[ X ]	[ ]	

YES NO NA

26 Has the facility accepted any waste not accompanied by a manifest or shipping papers?

[ ] [ X ]

- a. If yes, was the shipment excluded from manifest/shipping paper requirements?  
A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76]

[ ] [ ]

**Manifest System, Recordkeeping and Reporting Requirements:**

[X] Compliance [ ] Non-Compliance [ ] N/A

**Closure and Post-Closure (DCL)**

27 Does the owner/operator have a written closure plan for the facility?

[264.112(a)/265.112(a)]

[ X ] [ ]

a. If yes, does the plan include:

- A. A description of how and when the facility will be closed?  
[265.112(b)/265.112(b)]  
B. A description of the steps necessary to completely close the facility?  
[264.112(b)(2)/265.112(b)(2)]  
C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)]  
D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)]  
E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)]  
F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)]

[ X ] [ ]

[ X ] [ ]

[ X ] [ ]

[ X ] [ ]

[ X ] [ ]

[ X ] [ ]

28 Is the facility a disposal facility?

[ ] [ X ]

a. If yes, does the owner/operator have a written post-closure plan?

[264.118(a)/265.118(a)]

[ ] [ ]

If yes, does the plan include:

- A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)]  
B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?  
[264.118(c)(2)/265.118(c)(2)]  
C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)]

[ ] [ ]

[ ] [ ]

[ ] [ ]

**Closure and Post-closure Requirements:**

[ X ] Compliance [ ] Non-Compliance [ ] N/A

**Financial Requirements (DFR)**

29 Does the owner/operator have a written estimate of the closure cost?

[264.142(a)/265.142(a)]

[ X ] [ ]

30 Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143]

[ X ] [ ]

- 31 Is the facility a disposal facility? ☐ ☒
- a. If yes, has the owner/operator:
- A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)] ☐ ☐
- B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145] ☐ ☐
- C. Obtained liability insurance for nonsudden and accident occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? [264.147(b)/265.147(b)] ☐ ☐
- 32 Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? [264.147(a)/265.147(a)] ☒ ☐

Financial Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

Management of Containers (DMC)

- 33 Are containers presently used to store hazardous waste? ☒ ☐
- If yes,
- a. Are the containers in good condition? [264.171/265.171] ☐ ☒ Viol. 3
- b. Are the containers compatible with the waste? [264.172/265.172] ☒ ☐
- c. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173] ☒ ☐
- d. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174] ☒ ☐
- e. Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174] ☒ ☐
- If yes,
- A. Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)] ☒ ☐
- B. Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)] ☒ ☐
- C. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)] ☒ ☐
- D. Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)] ☒ ☐
- E. Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)] ☒ ☐
- f. Does the storage area store containers holding only wastes that do not contain free liquids? ☐ ☒
- If yes,
- A. Are the containment system requirements of 264.175(b)/265.175(b) met? ☐ ☐
- If no,
- i. Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR ☒ ☐
- ii. Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)] ☒ ☐



- |    |                                                                                                                                                                                                                                                                        | YES                                 | NO                       | NA |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|----|
| g. | Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176]                                                                                                                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    |
| h. | If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> |    |

<b>Management of Containers</b>	<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
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TSDLIST: TSD Checklist Revised 9/98

**Additional Information and Conclusions:**

## **RCRA Compliance Evaluation Inspection Summary**

### **SAFETY KLEEN, INC.**

2549 N. New York  
Wichita, Kansas 67219

**EPA ID No. : KSD 007 246 846**

**Inspection Date:** June 12 & 13, 2002

**KDHE INSPECTORS:** Debbie Travis, Steff Fackrell, SCDO, &  
Akhter Hossain, Topeka

### **1.0 INTRODUCTION:**

On June 12 & 13, 2002, a routine inspection was conducted at Safety Kleen, Inc. to determine compliance with state hazardous waste regulations and T/S/D status. The inspection covered points of waste generation, waste storage areas, and included a review of related documents and records. This facility was last inspected as both a T/S/D and an EPA Generator of Hazardous Waste on March 9, 2001. We arrived at the facility at approximately 9:10 a.m. and met with Russell J. Dunn, Facility Manager.

### **2.0 CHANGES SINCE PREVIOUS INSPECTION:**

This facility has been a transfer or holding facility since 2001. Hazardous waste material is shipped into the facility and then it is shipped out within one year. The facility is in the process of re certifying their tank farm. The tank farm is expected to become operational in approximately ninety days. Additionally, this facility maybe sold within a couple of months.

For previous violations refer to the attachments for the EPA RCRA CM&E Violations List.

### **3.0 INSPECTION:**

Mr. Russell J. Dunn and John Martin, Routing Supervisor, accompanied us on the inspection of the facility. Refer to the attachment for a facility site map. Safety Kleen has a computer generated logging and numbering system. Every container is labeled with a tracking number. Each year they use a different color. Blue was used in 2001 and Orange is being used in 2002. An example of the numbering system is as follows: (Drum#020515-Sund5-006) The first six numbers are the pickup date of the container. The four letters and a number are a code used for identifying the customer. The last three numbers are the specific number of the drum.

### 3.1 Building J

Building J is divided into seven container management units. The materials managed in these seven units are ignitable, non-ignitable, reactive, non-reactive, and other hazardous waste. We observed water on the floor throughout the building. At one unit location we observed that the bottom of a lab pak box was wet. Refer to photographs # 1 and 2.



Photograph 1

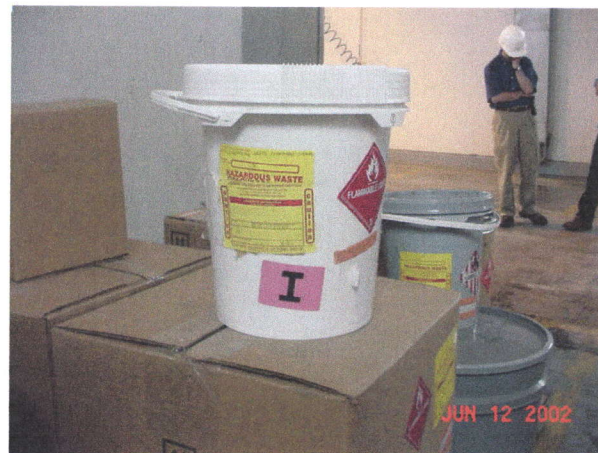


Photograph 2

John Rathgeber, Router, informed us that around 8:30 a.m. he found the top of a drum wet and the lab pak box was sitting on top of the drum. He moved the lab pak to a dry area. He planned on checking the contents of the lab pak later to verify that nothing in the lab pak was leaking. I asked Mr. Dunn when does the facility usually conduct their site inspections. Mr. Dunn stated that the inspections are usually in the afternoon. The roof in building J has been leaking at least since 12/31/00. Refer to the attachments for a weekly inspection log dated 12/31/00. There is a note on the log which states that water was pumped from the north side of the building and water was pumped from the south side of the building. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002.

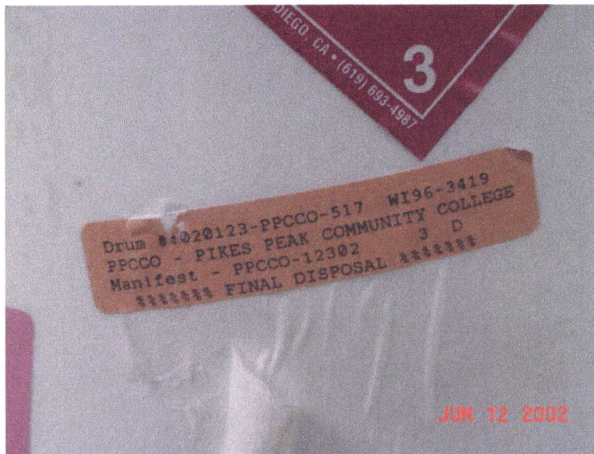
Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building J.

We observed no tracking label with a start accumulation date on a white 5-gallon lab pak (D#020123-PPCC0-517). Refer to photographs # 3 and 4. Violation 4: Permit Condition III.B.1 / K.A.R. 28-31-14 / 40CFR 268.50(a)(2)(i) was cited for no start accumulation date on the 5-gallon lab pak. This violation was corrected on 6/12/02. Refer to photograph # 5.

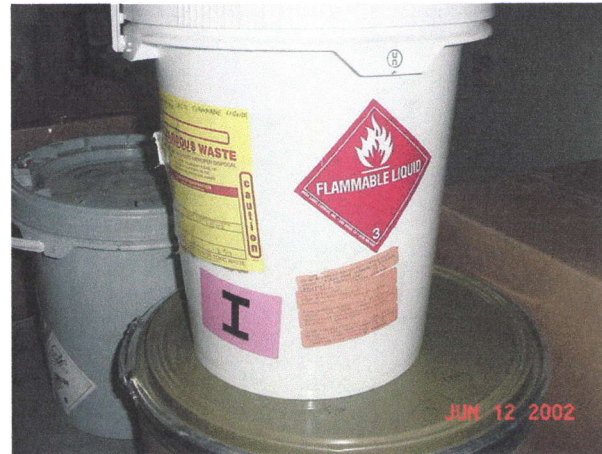


Photograph 3





Photograph 4



Photograph 5

We observed no tracking label on a cardboard lab pak box (D#020109-HCAW1-506). Refer to photograph # 6. Mr. Martin reviewed the container content sheet to determine what was inside the lab pak. Refer to the attachment for the container content sheet. Violation 4: Permit Condition. III.B.1 / K.A.R. 28-31-14 / 40CFR268.50(a)(2)(i) was cited for no start accumulation date on the lab pak box. This violation was corrected on 6/12/02 refer to photograph # 7.



Photograph 6



Photograph 7

### 3.2 Building I

Building I is divided into three container management units. The materials managed in these three units are ignitable, non-ignitable, reactive, non-reactive and other hazardous waste. The storage containers were labeled and dated correctly. There was water on the floor throughout the building. The water problem was identified



on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building I.

### 3.3 Building K

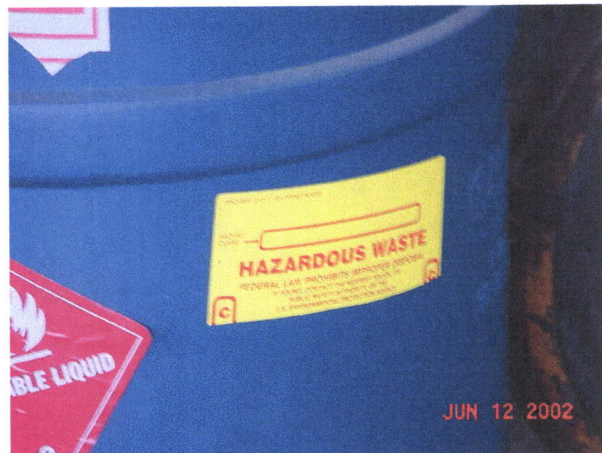
Building K is a non-permitted building. It is used to store office furniture.

### 3.4 Building B

Building B is divided into four container management units. The materials managed in these four units are corrosive and non-ignitable hazardous waste. We observed a blue 40-gallon satellite drum not marked with the words hazardous waste. Refer to photograph # 8. Violation 2: K.A.R. 28-31-4(j)(1)(B), was cited for the failure to mark a satellite drum with the words hazardous wastes. This violation was corrected on 6/12/02. Refer to photograph # 9. There was water on the floor throughout the building. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002. Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building B.



Photograph 8



Photograph 9

### 3.5 Building C

Building C is divided into seven container management units. The materials managed in these seven units include ignitable and non-ignitable hazardous waste. We observed a bulging lid on a black 55-gallon drum (D#020523-CATAL-001). The drum contains hazardous paint solvent. Refer to the attachments for the Material Profile on this waste. Refer to photographs # 10 and 11. Violation 3: Permit Condition III.C / K.A.R. 28-31-8 / 40CFR264.171 was cited for one storage drum not in good condition. This violation was corrected on 6/12/02. Refer to photograph # 12. The black drum was over packed into a yellow drum.





Photograph 10

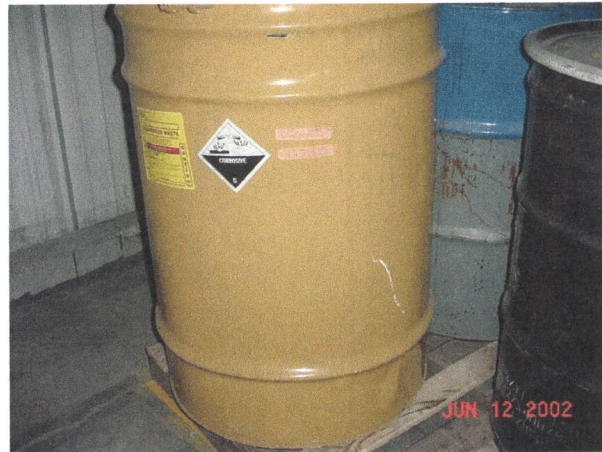


Photograph 11

### 3.6 Building D

Building D is divided into three container management units. The materials managed in these three units are ignitable and/or non-ignitable or a combination of both materials. Building D additionally stores fluorescent lamps, empty drums and maintenance equipment. Additionally, there are eleven horizontal tanks mounted in the ceiling. The tanks are not currently in use. The containers were labeled and dated correctly. We observed two to three inches of water in one area of this building. The roof in building D has been leaking at least since 1/1/01. Refer to the attachments for a weekly inspection log dated 1/1/01. There is a note on the log which states the roof leaks on shop. The water problem was identified on multiple inspection logs between March 9, 2001 and June 12, 2002.

Violation 6: Permit Condition II.A. was cited for failure to maintain the roof in building D.



Photograph 12

### 3.7 Tank Farm

The tank farm has nine tanks not currently in use. The facility is in the process of re-certifying the tanks. The tanks will be operational in approximately 90 days. The tank farm is inspected daily. There is a small amount of waste being stored in this area. The containers were labeled and dated correctly.

### 3.8 Laboratory

Heather Metzger, lab tech, conducts chemical analysis on samples taken from

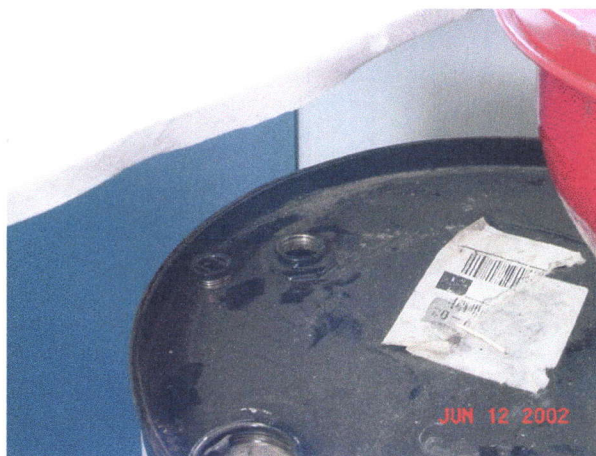


each waste material shipped to this site. We observed one 500-ml day container inside the fume hood and one 5-gallon day step can container in the lab. These containers are emptied daily into the satellite drums in the processing area. We observed one open black 30-gallon satellite drum containing hazardous liquid lab waste. Refer to photographs # 13 and 14. Violation 1: K.A.R. 28-31-4(j)(1)(A), was cited for an open satellite drum of hazardous waste. This violation was corrected on 6/12/02. Refer to photograph # 15.

### 3.9 Processing Area



Photograph 13



Photograph 14



Photograph 15

The processing area is divided into two container management units. The materials managed in both units are liquid and solid hazardous waste. The processing area is where containers are logged into the facility's computer and labels are generated. Laboratory sampling is conducted in this area. We observed one open black 55-gallon satellite drum containing personal protective equipment (PPE). Refer to photographs # 16 and 17. Violation 1: K.A.R. 28-31-4(j)(1)(A), was cited for one open satellite drum of hazardous PPE waste. This violation was corrected on 6/12/02.



Photograph 16



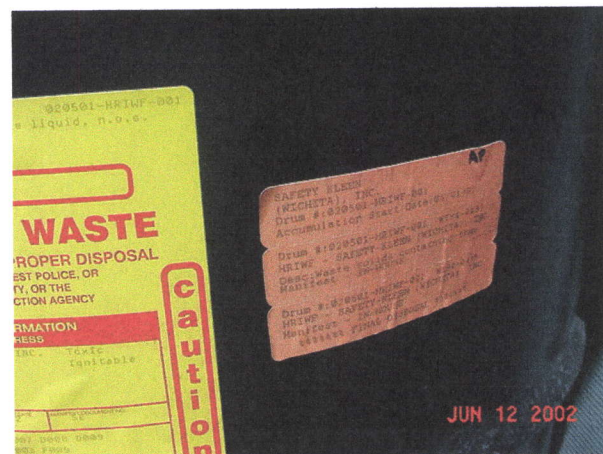
We observed two black 55-gallon satellite drums containing PPE waste. The date marked on the drums was 5/1/02. This was the date that the facility started filling the drums. Refer to photographs # 17 through 19. Violation 5: K.A.R. 28-31-4(j)(2) was cited for an improper start accumulation date on two 55-gallon satellite drums. This violation was corrected on 6/12/02. Refer to photographs # 20 and 21.



Photograph 17



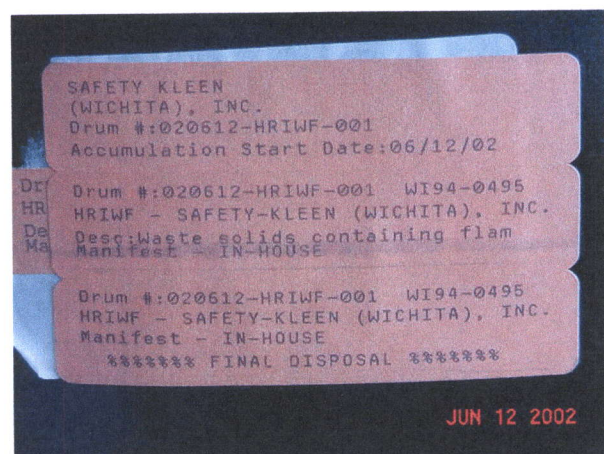
Photograph 18



Photograph 19



Photograph 20



Photograph 21



#### **4.0 Record Review:**

We reviewed the 2001 biennial report, contingency plan, personnel training documents, manifests, LDR's, and inspection logs from March 9, 2001 through June 13, 2002.

Violation 7: Permit Condition III.G. / K.A.R. 28-31-4(k), was cited for 138 violations on the daily and weekly inspection logs. Refer to the attachments for the spreadsheet labeled Safety-Kleen Inspection Log Violations and copies of all of the inspection logs. We observed 40 inspection logs with missing work orders. A problem would be identified on an inspection log and a work order number was listed. When we asked Mr. Dunn to retrieve the work order he could not always find the work order. We do not know if the corrective action was completed. We only cited a violation for each work order number even though sometimes there were multiple problems cited on one work order. We observed 71 inspection logs with no corrective action noted. A problem would be identified on the inspection log but there was no evidence that the problem had been corrected. We observed 22 inspection logs missing the time of the inspection. We observed 6 inspection logs missing the full name of the inspector.

Violation 8: Permit Condition I.I.2.e / K.A.R. 28-31-4(k), was cited for the failure to provide 61 daily inspection logs from May 1 through June 30, 2001. Ron Robertson, previous facility manager, had stored the inspection log records and the facility could not find them. I informed Mr. Dunn that they had until Monday, June, 17, 2002 to find the inspection logs. Mr. Dunn telephoned me on 6/17/02. He informed me that they could not find the inspection logs for May and June 2001. Refer to the attachments for the telephone conversation record dated 6/17/02.

Violation 9: K.A.R. 28-31-4(q) / 40CFR262, subpart E / Permit Condition I.G., was cited for the failure to file a notice with the Secretary of KDHE for the exporting of hazardous waste to a foreign country five different times, 3/14/01, 8/2/01, 11/8/01, 1/19/02, and 2/12/02. The facility did report the exports to the EPA. Refer to the attachment for the Safety Kleen annual EPA export reports dated April 19, 2001 and April 23, 2002. Additionally, refer to the fax dated 6/17/02 from Mr. Dunn, which lists all the shipments sent to Canada since March 2001.

#### **5.0 Exit Interview:**

After completing the walk through inspection, and reviewing the facility's paperwork, we conducted an exit interview with Mr. Dunn, Mr. Martin, and Mr. Robertson. We explained the violations and the corrective actions. Our additional comments were on employee training. Although no violations were cited concerning employee training, it was stated that many of the violations cited during this inspection could have been minimized if the employees had additional training. I left a Hazardous

Waste Generator Handbook with Mr. Dunn.

## **6.0 SUMMARY OF WASTE STREAMS:**

PPE

Floor Debris

Damaged Containers

Spill Cleanup Material

## **7.0 SUMMARY OF VIOLATIONS:**

Violation 1: K.A.R. 28-31-4(j)(1)(A), two open satellite drums of hazardous waste.

Violation 2: K.A.R. 28-31-4(j)(1)(B), failure to mark a satellite drum with the words hazardous waste.

Violation 3: Permit Condition III.C / K.A.R. 28-31-8 / 40CFR264.171, one 55-gallon storage drum not in good condition.

Violation 4: Permit Condition III.B.1 / K.A.R. 28-31-14 / 40CFR268.50(a)(2)(i), no start accumulation date on the two lab pak storage containers.

Violation 5: K.A.R. 28-31-4(j)(2), improper start accumulation date on two 55-gallon satellite drums.

Violation 6: Permit Condition II.A., failure to maintain the roof in building B, J, I, & D.

Violation 7: Permit Condition I.I.2.e / ~~K.A.R. 28-31-4(k)~~, 138 violations on the daily and weekly inspection logs.

Violation 8: Permit Condition III.G. / ~~K.A.R. 28-31-4(k)~~, failure to provide 61 daily inspection logs from May 1 through June 30, 2001.

Violation 9: K.A.R. 28-31-4(q) / 40CFR262, subpart E / Permit Condition I.G., failure to file a notice with the Secretary of KDHE for the exporting of hazardous waste to a foreign source five different times, 3/14/01, 8/2/01, 11/8/01, 1/19/02, and 2/12/02.

## **8.0 ATTACHMENTS:**

EPA RCRA CM&E Violation List for KSD 007 246 846  
Facility Site Map  
Material Profile for the Solvent Paint  
Container Content Sheet for Drum#020109-HCAW1-506  
Telephone Conversation Record dated 6/17/02  
Annual Export EPA Report dated April 19, 2001  
Annual Export EPA Report dated April 23, 2002  
Fax dated 6/16/02 from Mr. Dunn listing the export shipment dates since March 2001  
Inspection Log Violation Spread Sheet  
Daily and Weekly Inspection Logs

## **9.0 APPENDIX**

Photographs 1 through 21. The photographs were taken with a Sony Mavica digital camera by Debbie Travis or Steff Fackrell.